

BUILDING 707/707A DECOMMISSIONING BASIS FOR INTERIM OPERATION (DBIO)

CHAPTER 3 SAFETY MANAGEMENT PROGRAMS (SMPs)

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None.

3. SAFETY MANAGEMENT PROGRAMS

This chapter summarizes the Safety Management Programs (SMPs) that comprise the safety infrastructure at the Rocky Flats Environmental Technology Site (Site) that is implemented within Building 707/707A. It provides information to assist in understanding the programs or aspects thereof that affect the licensing (i.e., authorization of performance) of specific Building 707/707A Complex activities and operations. These programs address practices that are common in the DOE nuclear complex and ensure operations and activities are performed in a responsible manner with regard to human health and safety and environmental protection. The SMPs described in this chapter form the safety basis for all work performed at the Site and Building 707/707A.

The AB process for Building 707/707A as well as the Site relies on implementation of the SMPs to provide specific safety functions assumed in safety analyses. Compliance and implementation of these SMPs are required by the *Building 707/707A Decommissioning Basis for Interim Operation* (707/707A DBIO) and as such are governed by the Price Anderson Amendment Act (PAAA). However, inspection discrepancies in a program will not constitute violation of the safety basis unless the discrepancies are so gross that the overall safety function of an SMP is lost.

Safety Management Programs provide formal and disciplined methods of conducting business and operations while minimizing the potential for harm to the Public and Workers. The SMPs described in this chapter provide the infrastructure to meet the requirements of the Integrated Safety Management (ISM) philosophy as it is applied to all work activities at the Site. The primary objective of ISM is to perform work safely (i.e., protection of the Public, the Workers, and the environment is a fundamental part of work planning and execution processes). The Site's commitment to the SMPs described in this chapter supports the seven guiding principles of ISM. These principles are as follows:

1. Line management is responsible for the protection of the Public, the Workers, and the environment, and is responsible for establishing the environment to accomplish work safely.
2. Clear and unambiguous lines of authority and responsibility for ensuring safety are established and maintained at organizational levels within K-H and its subcontractors.

3. Personnel possess the experience, knowledge, skills, and abilities that are necessary to safely discharge their responsibilities.
4. Resources are effectively allocated to address safety, programmatic, and operational considerations and protecting the Public, the Workers, and the environment is a priority whenever activities are planned and performed.
5. Before work is performed, the associated hazards are evaluated and an agreed-upon set of safety standards and requirements are established which, if properly implemented, provide adequate assurance that the Public, the Workers, and the environment are protected from adverse consequences.
6. Administrative and engineering controls to prevent and mitigate hazards are tailored to the work being performed and the associated hazards.
7. The conditions and requirements required to initiate and conduct operations are clearly established and agreed-upon.

SMPs address three major areas:

1. Appropriate control of radiological and hazardous material hazards.
2. Regulatory compliance with federal and state requirements, codes and standards, and standard industrial health and safety practices.
3. Good engineering and management practices.

The Site SMPs address the following disciplines:

- Conduct of Operations.
- Configuration Management.
- Criticality Safety.
- Document Management.
- Emergency Preparedness.(EP)
- Engineering.
- Environmental Management.
- Fire Protection.
- Integrated Work Control.
- Nuclear Safety.

- Occupational Safety and Industrial Hygiene.
- Quality Assurance.
- Radiological Protection.
- Testing, Surveillance, and Maintenance.
- Training.
- Waste Management.

These programs are implemented on a Sitewide basis to assure the protection of the Public, the Workers, and the environment; however, specific aspects unique to Building 707/707A require implementation on a facility-specific basis. These aspects are noted individually below.

Key functional elements are identified for each SMP in the *Site SAR* (Ref. 3-1). Key functional elements are defined as a limited number of broad categories representing the significant components of the program. Individual topics associated with the programs are expected to fit into one of the broad categories.

As a minimum, the key functional elements for each SMP will include: (a) internal program organization and administration with defined scope, roles, responsibilities, and staffing; and (b) specific training and qualifications for program personnel commensurate with responsibilities. In addition, key functional elements highlight the principles advocated by the SMP to conduct activities in a responsible manner with regard to human health and safety and environmental protection.

Within the interrelated topics of the key functional elements, specific attributes are identified to assist with the implementation of AB requirements. The term "attribute" is defined as a specific aspect, principle, or concept that is important to Nuclear Safety in that it is recognized either inherently or explicitly in this nuclear safety accident analysis. Therefore, implementation and periodic evaluation of these attributes are required to maintain the validity of the nuclear safety analysis. Evaluation of these attributes is typically in the form of performance indicators and through routine assessments. Those specifically credited attributes will be defined as TSR-level controls to preserve those aspects of the Safety Analysis.

The attributes identified generally in the *Site SAR* (Ref. 3-1) and specifically in this 707/707A DBIO address the wide range of hazards existing in Building 707/707A because of past nuclear weapons production and ongoing decommissioning activities. These hazards range from standard industrial hazards (SIHs) to unique hazards associated with storage and handling of nuclear waste and decommissioning of the facility.

The wide range of hazards leads to implementation of SMPs using a graded-approach based upon the severity of the hazard. However, it is not the intent of safety analysis development to expend extensive resources on those hazards for which national consensus (i.e., standards and codes, for example, OSHA, and NFPA) already defines and regulates appropriate practices without the need for special analysis. SIHs are identified through the hazards analysis process and the interfaces with the safety analysis are discussed therein. Death or serious injury resulting from exposures to radiological and hazardous materials are not SIHs and are carried through the safety analysis, as appropriate. The SMPs address most SIHs and are applicable to Building 707/707A and other Site facilities. Occupational Safety and Health Act (OSHA) compliance is demonstrated through the SMPs, which addresses the vast number of worker safety issues typically found in all industrial settings, as well as in Building 707/707A.

In Building 707/707A, where significant amounts of radiological and hazardous materials are located, aspects of SMPs have been elevated to discrete Administrative Controls in the Technical Safety Requirements, based on requirements driven by the accident analysis. For example, combustible material control is implemented as part of the Fire Protection Program because the occurrence of a fire is undesirable anywhere on Site, from the loss of property and worker safety perspective. However, a fire involving radiological and/or hazardous materials has an added element in that Workers and possibly the Public may be exposed to airborne radioactive particulate. Therefore, in order to protect assumptions of the 707/707A DBIO accident analysis, combustible material controls are specifically identified in the TSRs. The implementation of these combustible material controls must comply with specified AC requirements.

As part of TSRs, the SMPs are under the scrutiny of the PAAA process, which identifies, reports and tracks nuclear safety noncompliances. Under the PAAA, DOE contractors, subcontractors, and suppliers are subject to civil penalties for violations of nuclear safety requirements.

Individuals are subject to criminal penalties for knowing and willful violations of nuclear safety requirements.

Safety Management Programs implement part of the Nuclear Safety Management Rule (10 CFR 830.120) to ensure that quality assurance criteria for management, work performance, and assessments are integrated so that compliance with nuclear safety requirements is achieved. The PAAA process screens issues and events occurring in nuclear facilities, or involving a nuclear activity, to determine any potential noncompliance with a nuclear safety rule.

Program oversight for the SMPs consists of formal evaluations of Site infrastructure program areas by the Site program managers, as well as less formal reviews. These evaluations may include Sitewide implementation effectiveness and assurance of compliance, with established program area requirements and expectations. These assessments are conducted as necessary and often take the form of trending assessments of performance indicators, readiness demonstrations, or activity oversight. In addition to Sitewide program oversight, facility management assessments are performed in accordance with the Self Assessment Program (SAP) established within Building 707/707A. These assessments are performed as a good management practice to determine the overall effectiveness of the programs and their implementation within the facility.

In general, the establishment and implementation of SMPs within Building 707/707A follows the discussion provided in the Site SAR for each of the SMPs. No further discussion is warranted in the 707/707A DBIO in the case of the SMPs: where the Site SAR fully addresses the program and its implementation within the facility; where no facility-specific exemptions or differences exist; and where no specific nuclear safety attributes exist that support the facility-specific accident analysis. In these cases, the Site SAR should be consulted for the discussion of a particular SMP. Only those cases where a facility specific difference or nuclear safety attribute exists are discussed below. As such, these discussions are limited to these differences. The remainder of the applicable SMP discussion can be found in the Site SAR.

Kaiser-Hill Company, L.L.C. (K-H) is committed to implementing the SMPs and recognizes that a programmatic deficiency must be evaluated against this AB. Gross failure of the program in those aspects relied upon to support the nuclear safety basis will violate this AB.

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All Site SMPs will be evaluated at least annually using the Site Independent Safety Review (ISR) process. Meetings will be established based upon program performance for the Program Owners to report on the health of their programs. The report will include performance indicators, corrective actions, and improvement opportunities.

The following SMPs contain specific nuclear safety attributes that support the facility specific safety analysis or contain facility specific differences with the Site SAR. These attributes and/or differences are detailed below. The remaining features of the subject SMPs not discussed below are consistent with the discussion provided in the Site SAR.

3.1 CONDUCT OF OPERATIONS

The Conduct of Operations Program provides a disciplined and formal method for safely performing work and operating Site facilities wherein individuals seek and accept responsibility in conducting operations and work, which is the premise of the Site's safety culture. Conduct of Operations is based upon the concept that Workers are provided with adequate knowledge of requirements and are disciplined in observing these requirements. Conduct of Operations is founded upon training, qualification, and use of procedures.

The Conduct of Operations SMP is established and implemented in Building 707/707A, consistent with the discussion provided in the Site SAR, with facility specific attributes or differences described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with the Conduct of Operations Program. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Conduct of Operations SMP described in the Site SAR.

Exemptions

None.

3.2 CONFIGURATION MANAGEMENT

Configuration Management at the Site is an integration of various functions within specific SMPs that ensure authorization bases, physical configurations, and supporting documents remain accurate based on changes in any or all of these factors. The purpose of the Configuration Management Program is to ensure that each contributing function is performing as required and effective integration is occurring amongst the functions.

The Configuration Management SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR, with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that the configuration of facilities in Building 707/707A is maintained in accordance with the Configuration Management process. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Configuration Management SMP described in the Site SAR.

Exemptions

None.

3.3 CRITICALITY SAFETY

The Criticality Safety Program establishes nuclear criticality safety requirements for all personnel at the Site. The program provides general emergency response requirements for all personnel and visitors at the Site and details specific requirements for facilities that handle, process, store, stage, transfer, and/or transport a significant quantity of fissionable material.

The Criticality Safety SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis acknowledges the importance to the Worker of the Criticality Safety Program in preventing criticality accidents. However, it is not listed as a credited or defense-in-depth control because it is not required for the Public or the Worker at 100 m. Therefore, no specific AC is created for criticality safety, and control of this program is left within the scope of the Criticality Safety SMP. A criticality event represents a significant non-industrial Worker hazard, hence, operability of the CAAS is elevated to a TSR-level control.

Facility Specific Differences

There are no facility specific differences with the Criticality Safety SMP described in the Site SAR.

Exemptions

Exemption request RFPK-DOE-C-420.1-EX-033F was approved by DOE, RFFO on May 24, 2001 and is applicable to Building 707/707A. This exemption pertains to the CAAS meeting the requirements of ANSI/ANS-8.3-1996, *Criticality Accident Alarm System*, as required by DOE Order 420.1A, *Facility Safety*. This requirement applies to all facilities with a CAAS. The exemption justification states that the identified compensatory measures ensure that personnel are sufficiently protected.

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3.4 DOCUMENT MANAGEMENT

The Document Management Program provides for the generation of accurate and consistent work control documents to ensure activities at the Site are conducted in a safe and consistent manner complying with appropriate regulations. This program provides the framework to ensure that personnel are knowledgeable of the hazards and appropriate responses to upset conditions. A result of this program is that the appropriate collective knowledge of technical, safety, and operations professionals is provided to the Worker for the performance of activities.

The Document Management SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with the approved documents, as part of the work control process and conduct of operations. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Procedures SMP described in the Site SAR.

Exemptions

None.

3.5 EMERGENCY PREPAREDNESS

The Emergency Preparedness (EP) Program establishes the Sitewide and building specific emergency response requirements to hazards as defined in the hazards basis of the Site SAR and building AB documents. Emergency planning is founded in the EP Hazards Assessments (EPHAs) including lessons-learned for buildings and operating systems containing hazards that, when involved in an upset condition, could result in the declaration of an operational emergency. Emergency operations are established to provide the infrastructure to respond to events involving the identified hazards. Emergency operations include the provision of a Site Emergency Response Organization and offsite interfaces through agreements and joint response requirements. The capability for emergency response is tested periodically through a formal drill and exercise program, both at the Sitewide level and building level.

The EP SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that EP will facilitate an appropriate response to emergency conditions, and that this response may mitigate the consequences of accidents to the Public and to Workers. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the EP SMP described in the Site SAR.

Exemptions

None.

3.6 ENGINEERING

The Engineering Program provides the requirements and controls for new designs and modifications to existing designs. Reviews of these activities, both internally and externally, ensure: (a) design accuracy; (b) proper application of regulatory, industry, and Site requirements; and (c) adherence to design basis and safety basis requirements. The program requires analysis of hazards involved in the affected areas through the Integrated Work Control Program. Qualification requirements of Engineering Program personnel also add to a defense-in-depth philosophy to maintain nuclear safety. Design documentation is also specified and controlled through the Engineering Program.

The Engineering SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that Engineering will be used in conjunction with Configuration Management to maintain the facility in accordance with applicable safety requirements. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Engineering SMP described in the Site SAR.

Exemptions

None.

3.7 ENVIRONMENTAL MANAGEMENT

The Environmental Management Program is focused on protecting, preserving, and enhancing the environment by complying with governing laws, permits, and compliance agreements. For AB considerations, complying with the requirements for environmental management by regulatory agencies, protection is provided to the Public and Workers. Thus, a process to identify and assess environmental protection associated with facility activities provides the knowledge needed to develop an appropriate set of controls for work activities.

The Environmental Management SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in compliance with environmental requirements. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Environmental Management SMP described in the Site SAR.

Exemptions

None.

3.8 FIRE PROTECTION

The Fire Protection Program provides a balanced approach for achieving pre-designated fire safety goals for Site facilities and Workers, the Public, and the environment. This basic principle, as embodied in the Fire Protection Program, provides sufficient fire protection to ensure: (a) the health and life safety of the employees in the event of a fire; (b) any fire that may occur will not threaten the health and welfare of the Public; (c) unacceptable delays in vital DOE programs will not occur; and (d) damage to DOE buildings and equipment will be maintained below specific dollar loss values should a fire occur.

The Fire Protection SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis specifically identifies the following attributes of the Fire Protection SMP for accident prevention or mitigation: combustible material controls, flammable gas controls, and hot work controls. These controls are either credited or identified as defense-in-depth for fire and explosion scenarios, as detailed in the accident analysis. Each of these attributes has a corresponding control contained in the TSRs that provides discreet requirements, Required Actions if the requirement is not met, and Surveillance Requirements. Aside from this, control of this program is left within the scope of the Fire Protection SMP.

Facility Specific Differences

In addition to the Sitewide Fire Protection Program, a facility program will be implemented in Building 707/707A to manage factors affecting fire safety in areas where work is being performed. The facility program will address the following facility specific attributes important to Nuclear Safety:

- Management of factors affecting fire safety, with the goal of preventing fire ignition and minimizing the impact if a fire does start.
- Management of combustible materials, not necessary for ongoing activities, to prevent unnecessary accumulation in work areas.

- Management of temporary equipment (e.g., portable heaters, portable lighting, extension cords) to ensure applicable safety requirements (e.g., manufacturer's instructions, UL labels, NFPA guidelines) are being met.
- Management of combustible materials in work areas, to ensure they are cleaned up at the end of the workday, in accordance with an approved cleanup checklist.
- Management of minor deviations, with respect to combustible material and ignition source controls, as they are created or identified.

The facility program is implemented by the Building 707/707A Fire Safety Officer (FSO). The FSO helps manage factors affecting fire safety in areas where work is actively being performed.

Exemptions

The following Fire Protection requirements and corresponding areas of exemption are currently recognized at the Site and apply to Building 707/707A:

- DOE Order 440.1, Worker Protection Management for DOE Federal and Contractor Employees, (DOE, 1995B)

Exemption: EX-045, Building 707/707A HVAC Ductwork and Chainveyors, Department Of Energy-Rocky Flats Field Office (DOE-RFFO) approved 02/09/1999

Exemption: EX-046, Nonlisted Deluge Valves and Kates Flow Control Valves, DOE-RFFO approved 02/09/1999

- DOE Order 5480.7A, Fire Protection, (DOE, 1993)

Exemption: EX-001, issue of Fire Dampers Within HVAC Ductwork, DOE-RFFO approved 05/31/1991

The three exemption requests involve: 1) use of fire dampers within HVAC ductwork; 2) HVAC ductwork and chainveyors (specifically, diminished sprinkler coverage); and 3) nonlisted deluge valves and Kates flow control valves (i.e., neither UL- nor Factory Mutual-approved).

Exemption request EX-001, regarding the use of fire dampers within HVAC ductwork, has been approved due to the fact that, although the requirement is appropriate for most industrial and/or commercial facilities, it is inconsistent with good Health Physics practices for plutonium facilities. This exemption request was approved with no resultant compensatory actions and, therefore, need not have any special consideration within this Fire Protection SMP, the accident analyses, or the TSRs.

In EX-045, an exemption to the 4-foot sprinkler spacing requirement was requested in accordance with NFPA 13, when a rigorous combustible program is in place. In EX-046, an exemption to the requirement for the deluge valves to be UL or Factory Mutual approved was requested and approved. Although the exemption is applicable to Building 707/707A, the plenum deluge valves are UL-listed.

3.9 INTEGRATED WORK CONTROL

The Integrated Work Control Program (IWCP) establishes the planning requirements and process controls for all work conducted at the Site, including emergency work. The IWCP ensures that work is screened and planned consistently to uniform criteria and that hazards are appropriately analyzed and controlled. Integrated work control is an integral part of daily operations, construction, decontamination and decommissioning (D&D), and maintenance within the facilities and is an effective tool for preventing accidents by ensuring that no unanalyzed or unauthorized work is performed.

The Integrated Work Control SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with the Integrated Work Control Program. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Integrated Work Control SMP describe the Site SAR.

Exemptions

None.

3.10 NUCLEAR SAFETY

The Site is a DOE-owned, contractor-operated nuclear complex, thus facilities are enveloped by the Nuclear Safety Program, which provides processes to evaluate the risk associated with performing activities involving or impacting nuclear materials. The purpose of the Nuclear Safety Program is to ensure all activities performed at the Site are evaluated and/or analyzed to identify mitigative and preventive measures and to determine risk to the Public, the Workers, and the environment. The Nuclear Safety Program also mandates the requirements for AB development, review, approval, and revision.

The Nuclear Safety SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that nuclear safety review of work in Building 707/707A is performed through the USQ process and that maintenance of the accident analysis and AB documentation will be performed. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Nuclear Safety SMP described in the Site SAR.

Exemptions

None.

3.11 OCCUPATIONAL SAFETY AND INDUSTRIAL HYGIENE

The Occupational Safety and Industrial Hygiene (OS&IH) Program is responsible for ensuring that all-applicable Federal health and safety practices are effectively implemented at the Site.

The OS&IH Program ensures that hazard analyses and assessments are performed to anticipate, identify, evaluate, and control facility- or activity-specific health and safety hazards. Job Hazard Analyses (JHAs) are implemented via the IWCP process. Health and safety hazards may be associated with facilities, processes, materials, equipment, tools, and operations. Types of hazards assessed include chemical, physical, biological, and ergonomic. Engineered or ACs may be implemented, as appropriate, to eliminate, or control the identified hazards or potential hazards.

The Occupational Safety and Industrial Hygiene SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that the Occupational Safety and Industrial Hygiene Program will provide primary protection to Workers from SIHs and from hazards that may be unique to work in Building 707/707A. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Occupational Safety and Industrial Hygiene SMP described in the Site SAR.

Exemptions

None.

3.12 QUALITY ASSURANCE

Site facilities and activities with the potential for radiological harm are required to be operated in accordance with a DOE-approved quality assurance program. At the Site, the Quality Assurance Program is a shared interdisciplinary function. It involves management and individual contributors from several organizations responsible for producing items, performing activities and services, and independently verifying that items, activities, and services comply with specified standards and requirements.

The Quality Assurance SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with applicable quality requirements. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Quality Assurance SMP described in the Site SAR.

Exemptions

None.

3.13 RADIOLOGICAL PROTECTION

The goal of the Radiological Protection Program is to establish and maintain adequate radiological protection, as it applies to Site activities (e.g. design, construction, operations, maintenance, and D&D activities) and to comply with all applicable requirements. The Radiological Protection Program provides a balanced approach for achieving pre-designated radiological safety goals for the Site facilities and Workers. This basic principle provides sufficient radiological protection commensurate with the nature of the activities performed by

applying the As Low As Reasonably Achievable process to occupational exposure. Furthermore, the Site endeavors to ensure radiation exposures to Workers and the Public, and releases of radioactivity to the environment, are maintained below regulatory limits.

The Radiological Protection SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with the Radiological Protection Program. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Radiological Protection SMP described in the Site SAR.

Exemptions

None.

3.14 TESTING, SURVEILLANCE, AND MAINTENANCE

The purpose of the Testing, Surveillance, and Maintenance (TSM) Program is to ensure that safety SSCs continue to perform their intended functions by conducting (a) periodic surveillances of equipment performance, (b) predictive and/or preventative maintenance on a predetermined schedule, and (c) corrective maintenance upon discovery of conditions that render SSCs inoperable. The TSM applies to both nuclear and non-nuclear facilities based upon the appropriate DOE order. The TSM Program uses a graded approach taking credit for the Site being a closure site.

The Testing, Surveillance, and Maintenance SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that sufficient testing, surveillance, and maintenance is performed to meet the requirements specified in the TSRs and SMPs. Specific SRs are presented in the TSRs. Aside from this, control of this program is left within the scope of the Testing, Surveillance, and Maintenance SMP.

Facility Specific Differences

There are no facility specific differences with the Testing, Surveillance, and Maintenance SMP described in the Site SAR, or in accordance with the TSR controls described above.

Exemptions

None.

3.15 TRAINING

The objective of the Training Program is to provide trained personnel to perform work in a safe, efficient and environmentally sound manner. The program is designed to ensure personnel are properly trained to perform specific job assignments.

The Training SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that Workers in Building 707/707A are trained to perform their jobs in accordance with all applicable requirements. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Training SMP described in the Site SAR.

Exemptions

None.

3.16 WASTE MANAGEMENT

The Waste Management Program establishes the Site processes to generate, characterize, package, and control hazardous, radioactive and mixed waste. The program identifies the requirements to be followed that will ensure non-radioactive hazardous, radioactive, and mixed waste from the Site meets disposal sites' waste acceptance criteria (WAC) and that while wastes are onsite they are managed in compliance with applicable regulations.

The Waste Management SMP is established and implemented in Building 707/707A consistent with the discussion provided in the Site SAR with facility specific attributes or differences, as described below.

Nuclear Safety Attributes

The 707/707A DBIO accident analysis assumes that work in Building 707/707A is performed in accordance with the Waste Management Program. The program is recognized to provide protection from SIHs; however, no Worker protection controls were identified which warrant elevation to TSR level.

Facility Specific Differences

There are no facility specific differences with the Waste Management SMP described in the Site SAR.

Exemptions

None.

3.17 REFERENCES

- 3-1. *Rocky Flats Environmental Technology Site SAR*, Rocky Flats Environmental Technology Site (RFETS), Golden, CO, Feb. 27, 2001.